

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ROSEN SCHAFER & DIMEO, LLP
BY: ILENE SCHAFER, ESQUIRE
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ATTORNEY FOR PLAINTIFF

JAMES REEVES, III, a minor by his p/n/g : **CIVIL ACTION**
ALTHEA JACOBS :
: :
: :

v. : **NO. 02-4428**
: :
: :

VANESSA CARTER-MORAGNE, et al. :
: :
: :

To the Honorable, the Judges of the Said Court:

The Petition of Althea Jacobs parent and natural guardian of James Reeves, III by their attorney Ilene Schafer, Esquire respectfully represents as follows:

1. That she is the parent and natural guardian of James Reeves, III who resides at 1934 Dalkeith Street, Philadelphia, Pa 19140. He is currently 16 years old, having been born on

[REDACTED] 1 and his SSN is [REDACTED]
2. On February 6, 2002, said minor was struck by a bullet in Imani Education Circle Charter School at 5612 Greene Street in the City and County of Philadelphia fired accidentally by defendant, Vanessa Carter-Moragne.

3. Thereafter, litigation commenced under the above civil action number and on April 21, 2003, Judge Dalzell signed an Order approving Plaintiff's Motion for Approval of Minor's Compromise and ordering that the net sum payable to James Reeves, III, a minor, be deposited in a Federally Insured Savings Account or Federally Insured Savings Certificate to be marked "Not to be withdrawn until minor reaches the age of eighteen or without an Order from a Court of competent Jurisdiction".

4. Thereafter, a Certificate of Deposit was opened up at Citizens Bank under

Account No. 6241-498415. To date, that Certificate has accrued interest and has a balance of over \$14,000.00 currently.

5. Attached hereto is a letter from Althea Jacobs regarding her request for release of \$2,545.00 for her son to attend Camp Emagination for computers.

6. Petitioner asserts in her letter that she is unable to afford said Camp and, James is an exceptional student who lives in a high crime area and she would like to help him advance his love of computers and allow him a safe summer and improve his chances for a successful future.

Wherefore, Petitioner respectfully requests this Court approve an Order allowing Petitioner to withdraw \$2,545.00 from the above described Certificate of Deposit for use in the purchase of a computer and printer for the minor plaintiff.

ROSEN, SCHAFER & DIMEO, LLP

BY: _____
ILENE SCHAFER, ESQUIRE

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ROSEN SCHAFFER & DIMEO, P.C. BY: ILENE SCHAFFER, ESQUIRE IDENTIFICATION NO.: 34418 121 S. BROAD STREET SUITE 800 PHILADELPHIA, PA 19107 (215) 864-9440		<i>ATTORNEY FOR PLAINTIFF</i>
JAMES REEVES, III, a minor by his p/n/g ALTHEA JACOBS v. VANESSA CARTER-MORAGNE, et al.	:	CIVIL ACTION NO. 02-4428

DECREE

AND NOW, this day of , 2008, upon consideration of the foregoing

Petition for Release of Minor's Funds, it is hereby ORDRED and DECREED that Althea Jacobs
is permitted to withdraw the sum of \$2,545.00 from the Citizens Bank Certificate of Deposit
under Account No. 6241-498415 for the registration and attendance at Camp Emagination.

BY THE COURT:

J.